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8 *Attorneys for Defendants, DIRECTV, LLC and AT&T Services, Inc.*

9 **UNITED STATES DISTRICT COURT**
10 **DISTRICT OF NEVADA**

11 JORGE OCHOA JR.,

12 Plaintiff,

13 vs.

14 NATIONAL CONSUMER TELECOM &
15 UTILITIES EXCHANGE, INC., AT&T
16 MOBILITY, LLC, DISH NETWORK, LLC,
17 DIRECTV, LLC AND
18 BACKGROUNDCHECKS.COM LLC,

19 Defendants.

Case No.: 2: 22-cv-01430-ART-DJA

**JOINT MOTION TO EXTEND
DEADLINE TO RESPOND TO
PLAINTIFF'S COMPLAINT (SECOND
REQUEST)**

20 Plaintiff, Jorge Ochoa Jr. ("Plaintiff"), and Defendant, DIRECTV, LLC and AT&T
21 Services, Inc. ("Defendants") (collectively "Parties"), by and through their counsel of record,
22 hereby stipulate and agree as follows:

23 On September 2, 2022, Plaintiff filed his Complaint [ECF No. 1]. Defendants were served
24 with Plaintiff's Complaint on September 6, 2022. The original deadline for Defendants to respond
25 to Plaintiff's Complaint was September 27, 2022. On September 28, 2022, the Court granted
26 Defendant's Joint Motion to Extend Deadline to Respond to Plaintiff's Complaint, which was set
27 October 27, 2022, as the new deadline [ECF No. 19]. The Parties have discussed extending the
28 deadline for Defendants to respond to Plaintiff's Complaint to allow for better investigation of the
allegations and discuss possible resolution of the matter.

WHEREAS, the Parties hereby stipulate and agree to extend the deadline for Defendants
to file their responsive pleading to Plaintiff's Complaint to November 17, 2022.

This is the second motion for an extension of time for Defendants to file its responsive

1 pleading. The extension is requested in good faith and is not for purposes of delay or prejudice to
2 any other party.

3 As part of this motion, Defendants agree to participate in any Rule 26(f) conference that
4 occurs during the pendency of this extension.

5 DATED this 27th day of October, 2022.

6
7 WRIGHT, FINLAY & ZAK, LLP

KIND LAW

8 /s/ Ramir M. Hernandez

/s/ Michael Kind

9 Ramir M. Hernandez, Esq.

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11 *Attorneys for Defendant, DIRECTV, LLC and*

Attorneys for Plaintiff, Jorge Ochoa Jr.

12 *AT&T Services, Inc.*

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14
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16 IT IS SO ORDERED:

17 
18 UNITED STATES MAGISTRATE JUDGE

19
20 DATED: October 28, 2022

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I am an employee of WRIGHT, FINLAY & ZAK, LLP and that I served the foregoing **JOINT MOTION TO EXTEND TIME TO RESOND TO PLAINTIFF'S COMPLAINT (SECOND REQUEST)** on the 27th day of October, 2022, to all parties on the CM/ECF service list.

/s/ Lisa Cox

An Employee of WRIGHT, FINLAY & ZAK, LLP